

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,  
ROSEANNE MORRILL, LEISA  
GARRETT, ROBERT NIXON,  
SAMANTHA NIXON, DAVID  
BOTTONFIELD, ROSEMARIE  
BOTTONFIELD, TASHA RYAN,  
ROGELIO VARGAS, MARILYN DEWEY,  
PETER ROLLINS, RACHAEL ROLLINS,  
KATRINA BENNY, SARA ERICKSON,  
GREG LARSON, and JAMES KING,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;  
HAPPY HOUR MEDIA GROUP, LLC, a  
Washington limited liability company; THE  
LAMPO GROUP, LLC, a Tennessee  
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION BETWEEN PLAINTIFFS  
AND DEFENDANT HAPPY HOUR MEDIA  
GROUP, LLC  
AND  
[PROPOSED] ORDER AMENDING  
DEFENDANT HAPPY HOUR'S DEADLINE  
TO RESPOND TO COMPLAINT AND  
RELATED BRIEFING SCHEDULES**

**Noted:** August 9, 2023.

1 WHEREAS, the Court entered a stipulated Order Regarding Deadlines to Respond to  
 2 Complaint and Related Briefing Schedules on July 6, 2023 (Dkt. 17), which set August 10, 2023,  
 3 as the deadline for motions to dismiss,

4 WHEREAS, counsel for the Plaintiffs and counsel for Defendant Happy Hour Media  
 5 Group, LLC (“Happy Hour”) have had several discussions about the possibility of resolving this  
 6 lawsuit with respect to Happy Hour, a settlement proposal has been made, each plaintiff, Happy  
 7 Hour, and the relevant insurer are aware of and contributing to the settlement discussions,

9 WHEREAS, Plaintiffs’ counsel at Albert Law, PLLC, and defense counsel at Corr Cronin,  
 10 LLP, have settled at least a dozen cases in which they represented adversaries during the past 3  
 11 years,

12 WHEREAS, Plaintiffs and Happy Hour believe it would be productive to allow settlement  
 13 discussions to continue without a motion to dismiss from Happy Hour pending.

15 THEREFORE, in the interest of efficiency and of encouraging settlement discussions,  
 16 Plaintiffs and Happy Hour have agreed to the following deadlines and ask that the Court enter an  
 17 Order adopting them:

18 Date by which any motion to dismiss by Happy Hour	
19 will be due:	October 5, 2023
20 Date by which any opposition will be due:	November 2, 2023
21 Date on which any motion will be noted and reply	
22 brief will be due:	November 10, 2023

23  
 24 STIPULATED TO this 9th day of August, 2023.

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*Attorney for Defendant Happy Hour Media Group, LLC*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this 10th day of August, 2023.

A handwritten signature in black ink, appearing to read "James L. Robart", is written over a horizontal line.

The Honorable James L. Robart  
United States District Judge